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10 *Attorneys for Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee Under the*  
11 *Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 DEUTSCHE BANK NATIONAL TRUST  
15 COMPANY, AS INDENTURE TRUSTEE  
16 UNDER THE INDENTURE RELATING TO  
17 IMH ASSETS CORP., COLLATERALIZED  
18 ASSET-BACKED BONDS, SERIES 2005-7,

19 Plaintiff,

20 vs.

21 OLD REPUBLIC TITLE INSURANCE  
22 GROUP, INC.; OLD REPUBLIC NATIONAL  
23 TITLE INSURANCE COMPANY; DOE  
24 INDIVIDUALS I through X; and ROE  
25 CORPORATIONS XI through XX, inclusive,

26 Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

27 **STIPULATION AND ORDER TO**  
28 **EXTEND TIME PERIOD TO RESPOND**  
**TO MOTION TO DISMISS [ECF No. 15]**

**[Fourth Request]**

29 Plaintiff, Deutsche Bank National Trust Company, as Indenture Trustee Under the  
30 Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7  
31 (“Deutsche Bank”), and Defendant Old Republic National Title Insurance Company  
32 (“ORNTIC”) (collectively, the “Parties”), by and through their counsel of record, hereby  
33 stipulate and agree as follows:

- 34 1. On October 9, 2020, Deutsche Bank filed its Complaint in the Eighth Judicial District  
35 Court, Case No. A-20-822776-C [ECF No. 1-1];

2. On October 30, 2020, ORNTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On December 10, 2020, ORNTIC filed a Motion to Dismiss [ECF No. 15];
4. Deutsche Bank's deadline to respond to ORNTIC's Motion to Dismiss is currently February 8, 2021 [ECF No. 25];
5. Deutsche Bank's counsel is requesting an extension until March 11, 2021, to file its response to the pending Motion to Dismiss;
6. This extension is requested to allow Deutsche Bank additional time to finalize and file its response to the pending Opposition in light of an unexpected medical emergency experienced by the lead handling counsel for Deutsche Bank.
7. Counsel for ORNTIC does not oppose the requested extension;
8. This is the fourth request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 8<sup>th</sup> day of February, 2021.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins

Lindsay D. Robbins, Esq.

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*Attorneys for Plaintiff, Deutsche Bank*

*National Trust Company, as Indenture*

*Trustee Under the Indenture Relating to IMH*

*Assets Corp., Collateralized Asset-Backed*

*Bonds, Series 2005-7*

DATED this 8<sup>th</sup> day of February, 2021.

EARLY SULLIVAN WRIGHT GIZER &  
McRAE LLP

/s/ Sophia S. Lau

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*Attorneys for Specially-Appearing Defendant*

*Old Republic Title Insurance Group, Inc.*

*and Defendant Old Republic National Title*

*Insurance Company*

**IT IS SO ORDERED.**

Dated this 8 day of February, 2021



Gloria M. Navarro, District Judge

UNITED STATES DISTRICT COURT